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18 Attorneys for Plaintiffs  
CORY SPENCER, DIANA MILENA  
19 REED, and COASTAL PROTECTION  
RANGERS, INC.  
20

21 **UNITED STATES DISTRICT COURT**  
22 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
23

24 CORY SPENCER, an individual;  
25 DIANA MILENA REED, an  
individual; and COASTAL  
26 PROTECTION RANGERS, INC., a  
27 California non-profit public benefit  
corporation,  
28

CASE NO. 2:16-cv-02129-SJO (RAOx)  
**STIPULATION RE DISMISSAL OF  
DEFENDANT N.F. WITHOUT  
PREJUDICE**

1                               Plaintiffs,

Complaint Filed:       March 29, 2016  
Trial Date:               November 7, 2017

2                               v.

3 LUNADA BAY BOYS; THE  
4 INDIVIDUAL MEMBERS OF THE  
5 LUNADA BAY BOYS, including but  
6 not limited to SANG LEE, BRANT  
7 BLAKEMAN, ALAN JOHNSTON  
8 AKA JALIAN JOHNSTON,  
9 MICHAEL RAE PAPAYANS,  
10 ANGELO FERRARA, FRANK  
11 FERRARA, CHARLIE FERRARA,  
and N. F.; CITY OF PALOS VERDES  
ESTATES; CHIEF OF POLICE JEFF  
KEPLEY, in his representative  
capacity; and DOES 1-10,

12                               Defendants.  
13

14  
15               Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties,  
16 through their respective counsel of record, hereby stipulate and agree as follows:

17               WHEREAS, Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal  
18 Protection Rangers, Inc. ("Plaintiffs") filed the above action against Defendants  
19 Lunada Bay Boys, Sang Lee, Brant Blakeman, Alan Johnston aka Jalian Johnston,  
20 Michael Rae Papayans, Angelo Ferrara, Frank Ferrara, Charlie Ferrara, N.F., the  
21 City of Palos Verdes Estates, and Chief of Police Jeff Kepley on March 29, 2016  
22 (Dkt. No. 1);

23               WHEREAS, Defendants City of Palos Verdes Estates and Chief of Police  
24 Kepley filed their Answer and defenses in response to Plaintiffs' Complaint on July  
25 25, 2016 (Dkt. No. 89); Defendants Angelo Ferrara, N.F., Papayans, Lee, and  
26 Johnston filed their Answers and defenses in response to Plaintiffs' Complaint on  
27 August 1, 2016 (Dkt. Nos. 92, 93, 94, 95); Defendant Blakeman filed his Answer  
28 and defenses in response to Plaintiffs' Complaint on August 2, 2016 (Dkt. No. 96);

1 and Defendants Charlie and Frank Ferrara filed their Answers and defenses in  
 2 response to Plaintiffs' Complaint on September 2, 2016 (Dkt. Nos. 124, 125);

3 WHEREAS, Defendants City of Palos Verdes Estates and Chief of Police  
 4 Kepley filed their Amended Answer and defenses in response to Plaintiffs'  
 5 Complaint on August 11, 2016 (Dkt. No. 102); Defendants Angelo Ferrara, N.F.,  
 6 Papayans, and Lee filed their Amended Answers and defenses in response to  
 7 Plaintiffs' Complaint on August 22, 2016 (Dkt. Nos. 108, 109, 110); and Defendants  
 8 Johnston and Blakeman filed their Amended Answers and defenses in response to  
 9 Plaintiffs' Complaint on August 23, 2016 (Dkt. Nos. 112, 114);

10 WHEREAS, Plaintiffs initiated their Complaint against N.F. in good faith, but  
 11 no longer desire to pursue their claims against N.F.;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the  
 13 parties that all claims against Defendant N.F. shall be dismissed without prejudice  
 14 by Plaintiffs, as described below:

15 1. Plaintiffs agree to dismiss without prejudice all claims asserted against  
 16 Defendant N.F.;

17 2. This Stipulation and Order is not an adjudication on the merits nor an  
 18 admission regarding Plaintiff's claims against Defendant N.F., nor is it an admission  
 19 by Defendant N.F. of any wrongdoing;

20 3. Defendant N.F. agrees to produce documents responsive to Plaintiffs'  
 21 previously-propounded Requests for Production of Documents notwithstanding this  
 22 instant Stipulation of Dismissal, and that the Court retains jurisdiction to order such  
 23 production; and

24 ///

25 ///

26 ///

27 ///

28 ///

1           4.     As to each other, Plaintiffs and N.F. agree to waive all claims to  
2 attorneys' fees and costs in this federal lawsuit.

3           **IT IS SO STIPULATED.**

4           \*Pursuant to Local Rule 5-4.3.4, the signatory listed below, and on whose  
5 behalf the filing is submitted, concurs in the filing's content and has authorized the  
6 filing of this Stipulation.

7 DATED: July 24, 2017

HANSON BRIDGETT LLP

8  
9  
10 By:           /s/ Samantha D. Wolff          

KURT A. FRANKLIN

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SAMANTHA D. WOLFF

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Attorneys for Plaintiffs

CORY SPENCER, DIANA MILENA  
15 REED, and COASTAL PROTECTION  
16 RANGERS, INC.

17  
18 DATED: July 24, 2017

LAW OFFICES OF MARK C. FIELDS,  
19 APC

20  
21 By:           /s/ Mark C. Fields\*          

22 Attorney for Defendant N.F.